

DATE: March 21, 2008

mailcode E-19J

Norman Stoner, Division Administrator
Federal Highway Administration
3250 Executive Drive
Springfield, Illinois 62703-4514

**RE: Final Environmental Impact Statement for the Prairie Parkway in
Grundy, Kendall and Kane Counties, Illinois, CEQ #20080073**

Dear Mr. Stoner:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the proposed Final Environmental Impact Statement (FEIS) for Prairie Parkway Project in Grundy, Kendall, and Kane Counties, Illinois. The project Purpose and Need proposes to improve regional mobility, address local (transportation) system deficiencies, improve access from the study area to regional jobs, and improve safety. This would be accomplished by the widening of IL 47 from I-80 north to Caton Farm Road with improvements, and construction of a new freeway between I-80 and I-88, approximately paralleling IL-47.

Our comments, dated February 26, 2007, on the Draft Environmental Impact Statement (DEIS) included concerns about the ability of the proposed build alternatives to meet the stated project purpose and need, wetland direct and indirect impacts, streams impacted by storm water run-off and crossings, wildlife impacts including federal and state listed threatened and endangered species, forest losses with impacts to both a state listed endangered species plus disruption of migratory bird nesting, and the scope of cumulative impact considerations.

The Prairie Parkway FEIS designates the combination of widening of IL 47 from I-80 to Caton Farm Road with building the B-5 alternative as the preferred alternative. The alternatives discussion in Chapter 3.4 presents year 2030 performance projections with tables and figures similar to those in the Draft Environmental Impact Statement (DEIS) purpose and need Chapter 1.3. The DEIS presents 2003 existing condition data and the FEIS compares the No-Action, B-2 and B-5 alternatives in the build-out year 2030. These satisfy the EPA concern for these documents providing adequate data to inform the public and decision makers regarding how well the project purpose and need are met by these options.

The alternatives were modified in response to public and agency comments as discussed in the FEIS Chapter 3.4 and visualized in Volume 2, Exhibits. One goal of these modifications is to reduce impacts to natural resources, including wetlands. The EPA expressed concerns specifically for direct impacts to wetland #50 and ADID wetlands #10 and #21, plus general concerns for salt and contaminant run-off and spray impacts to these and all other wetlands within the study corridor. By modification of the right-of-way (ROW) alignment, and design considerations, described in FEIS Chapter 4, direct impacts to the specific wetlands #50, #10 and #21 have been reduced and are proposed to be eliminated to the degree possible in final design considerations. We commend the team efforts taken to accomplish these results. Mitigation for wetland impacts were presented at the February 7, 2008 FHWA interagency meeting in Springfield, IL and EPA concurred with those proposals as modified for watershed appropriate sitings. The FEIS also commits to a bridge design for crossing the Fox River employing only one in-river and two island piling groupings.

EPA expressed concerns for project impacts to all wetlands and surface waters from deicing salt and road contaminant pollutants, which would either be carried by storm water, or blown as spray from the road and bridges. The FEIS Chapter 4.8 discusses two responses. The primary response to this issue is the provision of various capture and detention systems that should reduce the concentration of salt and other pollutants reaching these waters. These include: 1) vegetated swales, 2) ditch checks and detention storage, 3) infiltration facilities, and 4) wet detention basins with wetland plantings. Run-off from the Fox River bridge will be addressed by collecting and piping it to treatment basins. EPA asked that the FEIS provide an indication of how these would be maintained beyond the initial construction, and Volume 2, Appendix D.5 describes a maintenance program to be carried out by the Illinois Department of Transportation (IDOT). An adaptive management approach will be used for determining inspections at appropriate intervals, sediment loading levels and system damage controls. Since this is the key element to protecting these waters and their plant and animal life, EPA repeats its request that the Record of Decision (ROD) evaluates these systems or commits to monitoring the waterways impacted to determine that these mitigation measures are in fact effective in reducing salt and contaminants reaching these resources and protecting aquatic life.

We are concerned with salt concentrations due to the presence of many threatened and endangered species, plus many other species in these impacted surface waters, including but not limited to pollutant intolerant species such as the mottled sculpin, small mouth bass, rainbow darter, roseyface shiner and northern hogsucker; and mussels including the ellipse, slippershell and several redhorse varieties. A small remnant of Rock Elm trees, an endangered species, are also at risk due to salt spray. On page 4-64, the FEIS does commit to a continuing effort to find strategies for reducing salt application rates. EPA recommends that IDOT report to and coordinate these ongoing efforts with the Illinois Department of Natural Resources.

Regarding direct construction impacts, the FEIS commits to avoiding in-water construction activities from March 1 to May 31 every year to avoid silt impacts to fish breeding seasons. Likewise, the FEIS addresses the EPA concern for migratory neotropical birds, listed on page 4-32, by avoiding any tree cutting during their nesting seasons, from April 15 to September 1 every year.

Our letter of comment for the DEIS expressed concern that the scope of cumulative impacts discussion should include the related regional projects for widening Il 47 north of Caton Farm Road and the WiKaDuKe Trail. The FEIS noted that these had been included in the regional TIP since the DEIS was issued. Therefore, these two projects were incorporated into the No-Action Alternative for comparison to the build alternatives, thus addressing this concern.

We look forward to reviewing any supplementary information or the ROD for this project. If you have any questions, please contact Norm West of my staff at (312)-353-5692 or at west.norman@epa.gov.

Sincerely,

/S/

Kenneth A. Westlake, Supervisor
NEPA Implementation
Office of Enforcement and Compliance Assurance

Cc: IDOT
IDNR
US ACE
US FWS